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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

MARGARITA GONZALEZ WHITE,)	Case No.: 2:24-cv-03095-CKD
Plaintiff,)	STIPULATION AND ORDER FOR AN
vs.)	EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,)	
Defendant.)	

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended seven (7) days from April 11, 2025, up to and including April 18, 2025.

This is Defendant's first request for an extension, and it is made with good cause. Defendant's counsel is consulting with her client regarding issues in this case and is awaiting a response before she can proceed with defense. Moreover, counsel already has four (4) other briefs due in the next approximately two (2) weeks, along with other litigation matters and work required for her role as a coordinator for another jurisdiction. Thus, Defendant requires an

1 extension in this case and requests this extension in good faith and with no intent to delay these
2 proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: April 8, 2025

/s/ Josephine Gerrard*
(*as authorized via e-mail on April 8, 2025)
JOSEPHINE GERRARD
Attorney for Plaintiff

9 Dated: April 8, 2025

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14 By: /s/ Andrea Banks
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17 Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
20 extension, up to and including April 18, 2025, to respond to Plaintiff's Motion for Summary
21 Judgment.

22 Dated: April 8, 2025



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE